

# Exhibit 15

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**From:** Hung Ta  
**Sent:** Tuesday, September 1, 2020 7:32 PM  
**To:** Jeffrey C. Block  
**Cc:** Jacob Walker; Samuel Rudman; Luke Olts; Reed Kathrein  
**Subject:** RE: Tezos - fee allocation

No.

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**From:** Jeffrey C. Block <jeff@blockleviton.com>  
**Sent:** Tuesday, September 1, 2020 7:15 PM  
**To:** Hung Ta <hta@hgtlaw.com>  
**Cc:** Jacob Walker <jake@blockleviton.com>; Samuel Rudman <SRudman@rgrdlaw.com>; Luke Olts <LOlts@rgrdlaw.com>; Reed Kathrein <reed@hbsslaw.com>  
**Subject:** Re: Tezos - fee allocation

Hung,

We suggest that before we burden the Court with a fee allocation dispute, that we consider using a neutral (such as Layn who is familiar with the case) to help resolve this disagreement. I am sure the Court would appreciate our attempting to resolve this before seeking the Court's intervention.

Let us know.

Jeff

Jeffrey C. Block  
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**From:** Hung Ta <[hta@hgtlaw.com](mailto:hta@hgtlaw.com)>  
**Date:** Tuesday, September 1, 2020 at 10:25 AM

To: Jeffery Block <[jeff@blockleviton.com](mailto:jeff@blockleviton.com)>

Subject: Tezos - fee allocation

Jeff,

I got your voicemail.

This is our proposal for the allocation of the attorneys' fees. The fees should be allocated based on the collective lodestar of our group (HGT Law, LTL Attorneys, Lite DePalma and Restis Law Firm), versus the collective lodestar of your group (Block & Leviton, Robbins Geller, Hagens Berman and Taylor-Copeland) – an approximately 57% to 43% split. This is our best and final (and only) offer.

If you disagree with this proposal, we will file a motion with the Court and request that Judge Seeborg determine the appropriate allocation. In the event of such a motion, we would be entitled to seek from the Court a percentage that is greater than our group's collective lodestar. This would be based on the actual value of the contributions of the respective groups to the litigation and the settlement (as opposed to just the nominal amount of the groups' respective lodestars), and also recognizes that, as the Defendants repeatedly asserted at the mediation before Layn Phillips, the State Court Litigation was "dead in the water" and worthless.

Please let us know your position.



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